## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

TRICON ENERGY, LTD.	§
Plaintiff,	§
	§
v.	§ C.A. NO. 4:15-cv-00077
	§ Admiralty Rule 9(h)
M/V CELSIUS MAYFAIR,	§
her engines, tackle, boilers, etc. in rem,	§
	§
v.	§
	§
ODFJELL TANKERS AS, AND	§
STAINLESS 3 LTD.	§
Defendants.	Š.

## STATEMENT OF RIGHT OR INTEREST

COMES NOW Claimant, Stainless 3 Ltd., for the interest of itself, as the Owner of the M.V. Celsius Mayfair, her engines, tackle, etc., before this Honorable Court, and makes this claim to said Vessel under Rule E(8) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, and said Claimant avers that as of the time of the incident set forth herein, it was the true and bona fide Owner of the M.V. Celsius Mayfair, her engines, tackle, etc., and the owner of certain goods and chattels thereon; and wherefore prays to defend accordingly.

Respectfully submitted,

William A. Durham State Bar No. 06281800 S.D.TX. Adm. ID No. 4172 808 Travis, Suite 1300

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Attorneys for Claimant, Stainless 3 Ltd.

OF COUNSEL:

EASTHAM, WATSON, DALE & FORNEY, L.L.P.

## **VERIFICATION**

THE STATE OF TEXAS {
COUNTY OF HARRIS

BEFORE ME, on this day, came William A. Durham, who, stated as follows:

My name is William A. Durham and I am a member of the firm of EASTHAM, WATSON, DALE & FORNEY, L.L.P. and after being duly sworn deposed and said:

I am the attorney for Stainless 3 Ltd. The facts set forth in the Statement of Right or Interest are true and correct based upon information provided to me as attorney for Stainless 3 Ltd. The reason this affidavit is made by the undersigned is that he is the attorney for Stainless 3 Ltd., which is a corporation that does not have officers or directors within the district.

William A. Durham

SWORN AND SUBSCRIBED TO BEFORE ME this 14th day of January, 2015.

Notary Public, State of Texas

CAROL HENDRICKS
Notary Public
STATE OF TEXAS
My Comm Exp. Mar. 31,2018

## **CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I forwarded a true and correct copy of the foregoing instrument to the following counsel of record on this the 14<sup>th</sup> day of January, 2015.

Dana K. Martin Hill Rivkins LLP 55 Waugh Dr., Suite 1200 Houston, TX 77007

William A. Durham